



Gatineau, Québec  
K1A 0H3

29 February 2016  
Secretariat of the Basel, Rotterdam and Stockholm Conventions  
International Environment House  
11-13 chemin des Anémones  
1219 Châtelaine (Geneva)  
Switzerland

**Subject:** Decision BC-12/3: Technical guidelines on the environmentally sound management of wastes consisting of, containing or contaminated with persistent organic pollutants

Dear Secretariat,

Responding to the Decision 12/3 taken at COP12, Canada is pleased to send general views and information on our experience with the management of persistent organic pollutants (POPs).

Canada continues to follow closely the issue of POPs found in products and wastes. We recognize the low POP content of the Stockholm Convention as an important concept to ensure that POPs are not released into the environment when disposed. As reported under the Stockholm Convention in 2006 and 2012 through its National Implementation Plan, Canada takes significant measures through legislation, regulations, programs, policies, and other actions to manage and eliminate POPs from the environment.

Several POPs have been managed and controlled in Canada for many years through the actions of various levels of government. As a result:

- Canada has no stockpiles of the original POP pesticides. These were never manufactured in Canada and their use has been discontinued for many years. The sale or use of POP pesticides listed under the Stockholm Convention is prohibited through the *Pest Control Products Act*.
- The by-products dioxins and furans were declared toxic under the Canadian Environmental Protection Act in 1990. Canada-wide Standards focusing on atmospheric releases were developed in 2001 and 2003 and have been successful in reducing releases in five sectors: waste incineration; burning salt laden wood in coastal pulp and paper boilers; iron sintering; electric arc furnace steel manufacturing; and conical municipal waste combustion.
- Under the federal PCB Regulations, PCBs at a concentration of 50 mg/kg or more must be destroyed at authorized facilities. Below that concentration, PCBs must be managed in an environmentally sound manner.

While several POPs have been effectively controlled, some of the more recent ones listed under the Stockholm Convention bring new challenges in the environmentally sound management of waste containing these substances. This is the case for flame retardants such as PBDEs (hexa-BDE, hepta-BDE, tetra-BDE, and penta-BDE) and the industrial chemical PFOS, which are found in many consumer products. The manufacture, sale,

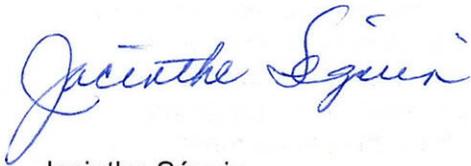
offer for sale, and import of these substances are already prohibited under federal regulations.

Nonetheless, we have undertaken work, e.g. studies to determine concentrations in landfill leachate to better understand the risk of releases of these substances through waste management activities in Canada. There remain gaps in our knowledge, and we continue to seek information on the presence and concentration of these POPs in different waste streams and their potential for releases through disposal and recycling operations. This will give us a strong baseline to explore best options for reducing and preventing the release of POPs into the environment.

Looking ahead, Canada will continue to investigate POPs listed under the Stockholm Convention to find effective measures and take steps necessary to prevent their releases into the environment as waste. This will be especially important for those POPs that are found in everyday consumer products, and where different solutions may be needed to meet both chemicals management objectives and circular economy goals.

We look forward to sharing the findings of our work with Parties when completed.

Sincerely,



Jacinthe Séguin  
Manager, Waste Reduction and Management Division  
Environment and Climate Change Canada